

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XiaoQian Zhao,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A,"

Defendants.

Case No.: 1:23-cv-04507

Hon. Judge Matthew F. Kennelly

DECLARATION OF ROBERT D. KREISMAN

I, Robert D. Kreisman, attorney for epicesolutions (#26), states pursuant to Rule 28 U.S.C.

¶1746(2) under penalty of perjury that the following is true and correct:

1. The eBay market entity, "epicesolutions" is Defendant in this cause (# 26).
2. epicesolutions first received notice of a default judgment on September 25, 2023.
3. The following day, September 26, 2023, I was notified by epicesolutions of the default judgment.
4. Although alleged in the Plaintiff's Complaint, the eBay entity, epicesolutions (#26) has never profited from any sale of any of the products alleged by the Plaintiff, and in fact made no such sales.
5. Epicesolutions has removed any and all postings that are in any way related to or connected to any of the products alleged in Plaintiff's Complaint. That removal from the eBay site was done as soon as notice of service of summons was sent to epicesolutions.
6. I was instructed by epicesolutions to negotiate a reasonable and final settlement. Up to now, Plaintiff's counsel has refused to engage.
7. The statements made in the Amended Motion to Vacate Default Judgment are made

on the facts provided to me and are true and correct.

I declare under penalty and perjury under the laws of the United States of America, that the foregoing statements and facts are true and correct.

Executed on October 16, 2023

/s/ Robert D. Kreisman

Robert D. Kreisman, attorney for
epicesolutions